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PROPOSED COUNSEL TO
THE CHAPTER 7 TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:)	CHAPTER 7 CASE
)	
JASON TAYLOR MARTN,)	CASE NO. 22-42492-ELM-7
)	
Debtor.)	
)	
BRENDA PARK,)	
)	
Plaintiff.)	
vs.)	ADVERSARY CASE NO. 23-4004
)	
JASON TAYLOR MARTN, CHRISTINA)	
ELIZABETH MARTIN, LAURIE REA, Chapter)	
7 Trustee for Jason Taylor Martin and DALTEX)	
CONSTRUCTION SERVICES, LLC,)	
)	
Defendants.)	

**TRUSTEE'S ORIGINAL ANSWER TO BRENDA PARK'S
COMPLAINT FOR DECLARATORY JUDGMENT**

TO THE HONORABLE EDWARD L. MORRIS, UNITED STATES BANKRUPTCY JUDGE:

Laurie Rea, in her capacity as the Chapter 7 Trustee (the "Trustee") for the estate of Jason Taylor Martin, files this *Trustee's Original Answer to Brenda Park's Complaint for Declaratory Judgment*, and would respectfully show as follows:

1. The Trustee agrees with the jurisdictional statements made in paragraph 1 of the Complaint.
2. The Trustees agrees that this is a core proceeding as asserted in paragraph 2 of the Complaint.
3. The Trustee agrees that venue is proper as asserted in paragraph 3 of the Complaint.
4. The Trustee admits the factual allegations in paragraph 4 of the Complaint.
5. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 5 of the Complaint.
6. The Trustee admits the factual allegations in paragraph 6 of the Complaint, but notes that her address is now 300 Throckmorton, Suite 520, Fort Worth, Texas 76102.
7. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 7 of the Complaint.
8. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 8 of the Complaint.
9. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 9 of the Complaint.
10. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 10 of the Complaint.
11. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 11 of the Complaint.
12. The Trustee admits the factual allegations in paragraph 12 of the Complaint.
13. Paragraph 13 does not require admission or denial.

14. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 14 of the Complaint.
15. The Trustee admits that there is a dispute as asserted in paragraph 15 of the Complaint.
16. The Trustee lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 16 of the Complaint.
17. The Trustee agrees that it is appropriate for the Court to determine this estate's ownership rights in Daltex Construction Services, LLC, but denies that the estate should bear any of Brenda Park's fees and costs.

Dated: February 10, 2023.

Respectfully submitted,

/s/ Laurie Dahl Rea
Laurie Dahl Rea
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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2023, a true and correct copy of the foregoing document was electronically filed in the above captioned case with the Clerk of the United States Bankruptcy Court by using the CM/ECF system and a copy was served via the Court's CM/ECF Electronic Notice. On the same date, I served a copy of this answer to counsel for plaintiff, Brenda Parks by email as set forth below:

Richard G. Dafoe
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Scott E. Hayes
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/s/ Laurie Dahl Rea
Laurie Dahl Rea